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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Kay Aguero,

Plaintiff,

v.

Experian Information Solutions, Inc;
Equifax Information Services, LLC;
Synchrony Financial; First Savings
Bank; Kohl's Inc.; Avant, LLC; Capital
One Bank; National Association; The
Bank Of Missouri; Discover Bank;
First Bank & Trust; and Comenity
Capital Bank,

Defendants.

Case No.: 2:23-cv-01155-APG-DJA

**Unopposed Motion for Extension of
Time for the Bank of Missouri, N.A.
to Answer or Otherwise Plead**

Second Request

1 Plaintiff Kay Agüero, hereby files this Unopposed Motion for Extension
2 of Time for the Bank of Missouri, N.A. to Answer or Otherwise Plead, and in
3 support states:

4 The Bank of Missouri, N.A.'s ("TBOM") responsive pleading is due on
5 September 14, 2023, as a result of a 14-day extension approved by the Court on
6 September 7, 2023. ECF No. 21.

7 Plaintiff and The Bank of Missouri are actively engaged in case
8 resolution negotiations.

9 Plaintiff files this Motion consistent with its agreement with TBOM and
10 further files this motion respectfully requesting the Court for a second extension
11 of time for TBOM to file its responsive pleading for 21 days to **Thursday,**
12 **October 5, 2023.** Plaintiff does not oppose the requested extension.

13 Notwithstanding the diligence of TBOM and its counsel with respect to
14 its investigation to date, TBOM seeks additional time to respond to the
15 Complaint for the purpose of completing its investigation of Plaintiff's claims
16 and TBOM's defenses, and discuss the merits of these items and, if warranted,
17 the possibility of settlement, with Plaintiff's counsel.

18 This is the second request for an extension of this deadline, but the
19 response deadline has not yet expired.

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1 For the forgoing reasons, Plaintiff requests that the Court issue an order
2 extending the date to **October 5, 2023** on which TBOM must answer Plaintiff's
3 complaint or otherwise plead.

4 Dated: September 13, 2023.

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6 **FREEDOM LAW FIRM, LLC**

7 /s/ Gerardo Avalos
8 George Haines, Esq.
9 Gerardo Avalos, Esq.
10 8985 South Eastern Ave., Suite 100
11 Las Vegas, NV 89123
12 *Attorneys for Plaintiff*

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14 IT IS SO ORDERED:

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17 UNITED STATES MAGISTRATE JUDGE

18 DATED: 9/14/2023
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